

MARC P. COOK, ESQ.
Nevada Bar No. 004574
GEORGE P. KELESIS, ESQ.
Nevada Bar No. 000069
COOK & KELESIS, LTD.
517 South Ninth Street
Las Vegas, Nevada 89101
Phone: (702) 737-7702
Fax: (702) 737-7712
E-mail: mcook@bckltd.com
E-mail: law@bckltd.com
Attorneys for Plaintiff, LATESHA WATSON

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LATESHA WATSON,

Plaintiff

v.

CITY OF HENDERSON; KEVIN
ABERNATHY; and DOES I through X,
inclusive,

Defendants

CASE NO. 2:20- CV-01761-CDS-CLB

**STIPULATION AND ORDER STAYING
THE TIME TO FILE SECOND
PROPOSED JOINT PRETRIAL ORDER**

[ECF 231 & ECF 238]

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, Latesha Watson, by and through her counsel, Mark Cook, of the law firm Cook & Kelesis, LTD and Defendants, City of Henderson, by and through its counsel, Patrick G. Byrne, Esq., Richard C. Gordon, Esq., Paul Swenson Prior, Esq., and Christian P. Ogata, Esq., of the law firm Snell & Wilmer L.L.P., and Kevin Abernathy, by and through his counsel of record, Nicholas M. Wieczorek and Gia N. Marina, of the law firm Clark Hill PLLC, that the filing of the Parties' Second Proposed Joint Pretrial Order be stayed until thirty (30) days following the Court's decision on pending dispositive motions.

1 In entering into this stipulation to extend time, the parties represent as follows:

2 1. On May 9, 2024, Plaintiff filed a Second Amended Complaint and Jury Demand
3 [ECF 223].

4 2. On May 16, 2024 the parties appeared before the Court for a status check, during
5 which the Court ordered the parties to meet and confer within 30 days and file a Proposed Joint
6 Pretrial Order by June 28, 2024 [ECF 224].

7 3. Following that hearing and in response to Plaintiff's Second Amended Complaint,
8 on June 21, 2024, Defendant Abernathy filed a Motion to Dismiss [Doc. 229} and Defendant City
9 of Henderson filed a Motion for Summary Judgment [Doc. 230]. The briefing of those Motions
10 is ongoing.
11

12 4. On June 28, 2024 the Parties filed a proposed Joint Pretrial Order [Doc. 231].

13 5. On August 8, 2024, the Court entered an Order rejecting the Joint Pretrial Order as
14 filed and requiring the parties to submit a second proposed Joint Pretrial Order to address
15 deficiencies outlined in that Order [ECF 238].
16

17 6. Pursuant to LR 26-1(b)(5), if dispositive motions are filed, the deadline for
18 submitting a joint pretrial order will be suspended until 30 days after decision on the dispositive
19 motions or further court order.
20

21 7. The parties therefore stipulate and request that the Court enter an Order staying
22 the time within which the parties must submit a second Joint Pretrial Order until thirty (30) days
23 following the Court's decision and order on the pending dispositive motions.
24
25
26
27
28

8. This stipulation is made in good faith, is permissible under the local rules, and is not for the purpose of delay.

<p>DATED this <u>15th</u> day of August, 2024.</p> <p>COOK & KELESIS, LTD.</p> <p>By: <u>Marc Cook /s</u> MARC P. COOK, ESQ. Nevada Bar No. 004574 JULIE L. SANPEI, ESQ. Nevada Bar No. 005479 517 South Ninth Street Las Vegas, Nevada 89101 Attorneys for Plaintiff, Latesha Watson</p>	<p>DATED this <u>15th</u> day of August, 2024.</p> <p>CLARK HILL PLLC</p> <p>By: <u>Nicholas Wieczorek /s</u> NICHOLAS M. WIECZOREK, ESQ. Nevada Bar No. 006170 3800 Howard Hughes Parkway, Suite 500 Las Vegas, Nevada 89169 Attorney for Defendant Kevin Abernathy</p>
<p>DATED this <u>15th</u> day of August, 2024.</p> <p>SNELL & WILMER,</p> <p>By: <u>Patrick Byrne /s</u> PATRICK G. BYRNE, ESQ. Nevada Bar No. 007636 RICHARD C. GORDON, ESQ. Nevada Bar No. 009036 PAUL SWENSON PRIOR, ESQ. Nevada Bar No. 009324 CHRISTIAN P. OGATA, ESQ. Nevada Bar No. 15612 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, Nevada 89169 Defendant City of Henderson</p>	

ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated: August 19, 2024